

REMARKS

Abstract

Applicant submits a new abstract consistent with the claims pending in this application.

Claim amendments

Applicant amends claim 68 to correct a minor informality.

Section 112 rejection

Claim 71 recites the additional limitation that the act of sending the image to the display includes the act of sending the image from a building server to a plurality of elevator cabs.

The Examiner states that claim 71 "is based on multiple cars and only a single car."

Applicant cannot understand the logical difficulty with claim 71. To see this, let "A" = "the set of all possible steps that will result in sending an image to a display." Let "a" = "the step of sending an image from a building server to a plurality of elevator cabs." Certainly, step "a" results in an image being sent to a display. Therefore, by definition, step "a" properly belongs in set "A." It is true that step "a" also results in sending an image to other displays, but this does not disqualify it from membership in set "A."

Since claim 71 essentially picks out element "a" from set "A," it is in proper dependent form. Therefore there is no basis for a rejection under section 112.

Prior Art Rejections

Section 103 rejection

Independent Claim 55

The Examiner rejected claim 55 as being unpatentable over *Hughes*¹ and *Rakavy*². We submit however that neither *Hughes* nor *Rakavy* describe or suggest a

¹ *Hughes* et al., U.S. Patent No. 6,288,688.

method for displaying an image on a plurality of displays, ...comprising: inspecting a playlist having first data leading to first information to be displayed; on the basis of the first data, retrieving the first information; [and] assembling second data, the second data being representative of the image that includes the first information ..., as recited in independent claim 55.

Applicant draws attention to the limitation of “assembling second data, the second data being representative of the image that includes the first information.”

Hughes does not teach this claim limitation. At best, *Hughes* describes a sequence of images to be displayed with a given advertisement. In this regard, file name “IMG1.JPG” would presumably be “first data.” In that case, the “first information” would be the actual image stored in IMG1.JPG. *Hughes* does not teach assembling second data, the second data being representative of the image that includes the first information, as required by claim 55/

It is also unclear where *Rakavy* would teach this claim limitation. *Rakavy* states:

FIG. 5 shows a schematic representation of an Advertisement 50. Each Advertisement 50 in the Server Database 730 comprises an Advertisement Information Record 51 and a Resource List 52. The Advertisement Information Record 51 contains information identifying the advertisement (including the Advertisement-ID 55), its category, its size, and the hardware required to display the advertisement, such as sound boards, screen resolution and multimedia requirements. The Resource List 52 contains a list of resources (bitmaps, animations, digitized audio segments, executable code, etc.) that must exist on the Local Computer 500 or associated local LAN in order to present the advertisement. The Resource List 52 includes a unique resource-ID, a resource type, and a resource pointer. The resource pointer identifies a file, a database record, a block of data, or other means of identifying the resource. In this manner, resources can be shared by various Advertisements 50 (column 7, lines 13-29).

Rakavy describes a Resource List 52, which includes “resource pointers” that identify resources, e.g., bitmaps, animations, of the Advertisement 50. At best, a resource pointer is

² *Rakavy* et al., U.S. Patent No. 5,913,040.

presumably "first data," the "first information" would be the resource identified by the resource pointer, e.g., a bitmap or animation. Moreover, while FIG. 5 of *Rakavy* depicts "Ad Information" for "identifying the advertisement," this ad information, in contrast, is not representative of the image that includes the first information, e.g., a resource such as a bitmap or animation. The ad information reveals nothing about the resource. Therefore, it is still unclear what is to be regarded as "assembling second data, the second data being representative of the image that includes the first information."

There is a further reason why neither *Hughes* nor *Rakavy* disclose the invention recited in claim 55. Applicant submits that neither *Hughes* nor *Rakavy* disclose a "playlist." *Hughes* describes "play instructions 140," for causing a sequence of images to appear on the display. In the example given in FIG. 13A, the first image, which is stored in the file "IMG1.JPG," advertises a \$2.99 special at Joe's Deli. The second image, which is stored in the file "IMG2.JPG," shows the address of Joe's Deli. The play instructions 140 appear to define a ten second advertisement in which the first image is displayed for five seconds, after which the second image is displayed for the remaining five seconds.

The *Hughes* play instructions 140 therefore controls the display of images that collectively define an advertisement. These play instructions do not control when the advertisement itself will be displayed. All they do is control the sequence of images that collectively comprise one advertisement.

According to Applicant's specification, a playlist schedules when content is to be played. This is different from the *Hughes* play instructions, which define, within a particular advertisement, what sequence of images are to be played in a given advertisement.

Since claim 55's playlist and the *Hughes* "play instructions" cannot be regarded as the same thing, it follows that *Hughes* cannot disclose claim 55's "playlist." There is also no indication that *Rakavy* teaches any such "playlist." Therefore, the combination of *Rakavy* and *Hughes* cannot disclose claim 55's playlist.

It is apparent that the proposed combination of references fails to teach or suggest the subject matter of claim 55. Accordingly, Applicant requests reconsideration and withdrawal of the section 103 rejection of claim 55.

Because 56-67 depend from independent claim 55, these dependent claims are patentable for at least the same reasons that claim 55 is patentable.

Independent Claim 68

The Examiner rejected claim 68 as being unpatentable over *Hughes* and *Rakavy*. We submit however that neither *Hughes* nor *Rakavy* describe or suggest a method for displaying an image on a plurality of displays, ...comprising: inspecting a playlist having first data leading to first information to be displayed; on the basis of the first data, retrieving the first information for display in the elevator cab," as recited in independent claim 68. For the reasons discussed in conjunction with claim 55, the combination of *Rakavy* and *Hughes* cannot disclose claim 68's playlist.

Because 69-83 depend from independent claim 68, these dependent claims are patentable for at least the same reasons that claim 68 is patentable.

Summary

Applicant encloses a petition for extension of time (3 months) with authorization to charge a deposit account. To the extent that additional fees are due, or if a refund is forthcoming, please adjust our deposit account 06-1050, referencing attorney docket "09651-012003."

Applicant : Todd A. Newville et al.
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Respectfully submitted,



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